



Bernstein-Burkley, P.C.  
Keri P. Ebeck, Esquire  
Bar No. 262092017  
707 Grant Street, Suite 2200, Gulf Tower  
Pittsburgh, PA 15219  
(412) 456-8112

Order Filed on January 17, 2020  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

ATTORNEY FOR CREDITOR: CONSUMER PORTFOLIO SERVICES, INC.

**IN THE BANKRUPTCY COURT FOR THE  
DISTRICT OF NEW JERSEY (CAMDEN)  
HONORABLE JERROLD N. POSLUSNY, JR.**

In re: : Case No. 19-13736-JNP  
:   
JOHN WORTHY, and :   
GEORGINA WORTHY, :   
Debtors, :   
: Chapter 13  
:   
: Hearing Date: January 14, 2020  
:   
\_\_\_\_\_ :

CONSENT ORDER MODIFYING STAY AS TO MOTOR VEHICLE  
2015 NISSAN MURANO, VIN #5N1AZ2MH4FN207276

The relief set forth on the following pages, number one (1) through four (6) is hereby  
ORDERED.

**DATED: January 17, 2020**

A handwritten signature in dark ink, appearing to read "J. Poslusny", is written over a horizontal line.

Honorable Jerrold N. Poslusny, Jr.  
United States Bankruptcy Court

Debtors: John Worthy and Georgina Worthy  
Case No.: 19-13736-JNP  
Caption of Order: Consent Order Modifying Stay as to Personal Property

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1. The 11 U.S.C. §362(a) Stay as to Consumer Portfolio Services, Inc., (“Movant”), with respect to the personal property of Debtors described as a 2015 Nissan Murano, VIN #5N1AZ2MH4FN207276, in accordance with the agreement of the Debtors and Movant is hereby modified and shall remain in effect PROVIDED THAT Debtors comply with the following terms and conditions:

The arrears are \$3,644.95 as of the date of this Consent Order. Debtors shall cure the arrears and fees and costs by making the following payments on the following dates:

January 28, 2020 - \$1,315.65

February 28, 2020 - \$1,315.65

March 28, 2020 - \$1,315.65

April 28, 2020 - \$1,315.65

May 28, 2020 - \$1,315.65

June 28, 2020 - \$1,315.65

Debtor shall then be responsible for timely making all future regular monthly payments to Movant starting with the payment of \$708.16 due on July 28th, 2020. Failure to make future monthly payments shall also be cause for default under this Consent Order.

2. The term “payment” as set forth in Paragraph 1, *supra*, does not include a check that is returned due to insufficient funds, account closed or is otherwise not capable of negotiation for any other reason.

3. Debtor will be in default under the Consent Order in the event that Debtor fails to comply with the payment terms and conditions in Paragraph 1, *supra*. If Debtor fails to cure the default within ten (10) days from the date of default, Movant may file a Certification of

Debtors: John Worthy and Georgina Worthy  
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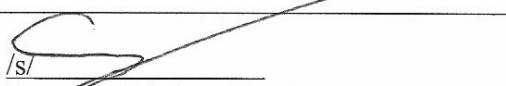
Default on five (5) days' notice to Debtor, counsel for the Debtor and the Chapter 13 Trustee for an Order lifting the automatic Stay imposed under 11 U.S.C. §362(a) and permitting Movant to exercise any rights under the loan documents with respect to the motor vehicle including, but not limited to, initiating and completing sale of the motor vehicle without regard to any future conversion of this matter to a different form of bankruptcy.

4. The failure of Movant to file a notice of default will not be construed or act as a waiver of any of the rights of Movant under the Consent Order.

5. In the event the Debtor converts to a bankruptcy under any Chapter other than Chapter 13 of the Bankruptcy Code, then Debtor shall pay all pre-petition arrears and post-petition arrears within fifteen (15) days from the date the case is converted from Chapter 13 to any other Chapter.

6. Movant's fees and costs of \$531 are to be paid through the Chapter 13 Plan.

We hereby Consent to the form and entry of the foregoing Order.

<u>/s/ Keri P. Ebeck</u> Keri P. Ebeck , Esquire Bernstein-Burkley, P.C. 707 Grant Street, Suite 2200 Gulf Tower Pittsburgh, PA 15219 (412) 456-8112 Email: <a href="mailto:kebeck@bernsteinlaw.com">kebeck@bernsteinlaw.com</a>	<u>/s/</u>  Stacey L. Mullen, Esquire Law Office of Stacey L. Mullen 2091 N. Springfield Rd Suite 17 Cherry Hill, NJ 08003 (856) 778-8677 Email: <a href="mailto:slmullen@comcast.net">slmullen@comcast.net</a>
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Dated: January 17, 2020

Certificate of Notice Page 4 of 4

United States Bankruptcy Court  
District of New Jersey

In re:  
John Worthy  
Georgina Worthy  
Debtors

Case No. 19-13736-JNP  
Chapter 13

**CERTIFICATE OF NOTICE**

District/off: 0312-1

User: admin  
Form ID: pdf903

Page 1 of 1  
Total Noticed: 1

Date Rcvd: Jan 21, 2020

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jan 23, 2020.  
db/jdb +John Worthy, Georgina Worthy, 217 Stirrup Road, Logan Twp., NJ 08085-1440

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
NONE. TOTAL: 0

\*\*\*\*\* BYPASSED RECIPIENTS \*\*\*\*\*

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.  
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

**I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Jan 23, 2020

Signature: /s/Joseph Speetjens

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**CM/ECF NOTICE OF ELECTRONIC FILING**

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on January 21, 2020 at the address(es) listed below:

Denise E. Carlon on behalf of Creditor MIDFIRST BANK dcarlon@kmlawgroup.com,  
bkgroup@kmlawgroup.com  
Isabel C. Balboa on behalf of Trustee Isabel C. Balboa ecfmail@standingtrustee.com,  
summarymail@standingtrustee.com  
Isabel C. Balboa ecfmail@standingtrustee.com, summarymail@standingtrustee.com  
Keri P. Ebeck on behalf of Creditor Regional Acceptance Corporation kebeck@bernsteinlaw.com,  
jbluemle@bernsteinlaw.com  
Keri P. Ebeck on behalf of Creditor Consumer Portfolio Services, Inc. kebeck@bernsteinlaw.com,  
jbluemle@bernsteinlaw.com  
Kevin Gordon McDonald on behalf of Creditor MIDFIRST BANK kmcdonald@kmlawgroup.com,  
bkgroup@kmlawgroup.com  
Stacey L. Mullen on behalf of Joint Debtor Georgina Worthy slmullen@comcast.net  
Stacey L. Mullen on behalf of Debtor John Worthy slmullen@comcast.net  
U.S. Trustee USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 9